

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

SEIBENTHAULER LODGE,

Plaintiff,

vs.

Case No. 2:17-cv-01180 SMV KRS

CITY OF CLOVIS, CLOVIS POLICE
DEPARTMENT, OFFICER BRENT
AGUILAR, OFFICER BRICE STACY,
OFFICER STEPHEN BORDERS, OFFICER
AMANDA BOREN, OFFICER CHRISTOPHER
CARON, OFFICER DOUGLAS OSBORN, AND
OFFICER CHRISTIAN TOWNSEND, in their
Individual and Official Capacities,

Defendants.

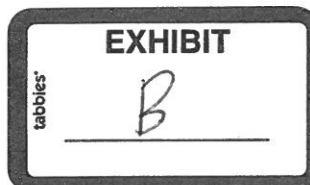
AFFIDAVIT OF AMBREE K TAYLOR-HERNANDEZ

I, Ambree K Taylor-Hernandez, affirm under penalty of perjury under Federal and New Mexico State law that the following statements are true and correct:

1. I am over eighteen years of age and have personal knowledge of the statements made in this affidavit.

2. In the early morning hours of November 1, 2015, I was attending a party on Kathy Drive in Clovis, New Mexico when I was punched in the face twice by Seibenthaler Lodge.

3. As a result of these punches, I saw stars and suffered a laceration on my nose, severe bleeding from my nose, nasal fractures, swelling in my right eye, cuts on the right eyeball, and inability to open my right eye.



4. Soon after being punched by Mr. Lodge and suffering the above-referenced symptoms on November 1, 2015, I presented to several Clovis Police Officers who were investigating the incident.

5. When I spoke with the investigating Clovis Police Department Officers after being punched on November 1, 2015, I was crying and bleeding severely from my nose.

6. When I spoke with the investigating Clovis Police Department Officers after being punched on November 1, 2015, I was asked on several different occasions by several different officers for the identity of the person who had punched me and each time, I identified Seibenthaler Lodge, who was also present at the scene of the investigation.

7. After speaking with the investigating officers on November 1, 2015, I was transported to Presbyterian Hospital where I was diagnosed with right eye trauma, a facial contusion, a nasal laceration, a subarachnoid hemorrhage, and nasal fractures.

8. Presbyterian Hospital found these conditions sufficiently serious to have me flown to the trauma center at UMC Health System in Lubbock, Texas on November 1, 2015 for further evaluation, diagnosis, and treatment.

9. The foregoing statements were made on this [13] day of March, 2018.


AMBREE K TAYLOR-HERNANDEZ